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18

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 RICHARD KADREY *et al.*,
23 Individual and Representative Plaintiffs,
24 v.
25 META PLATFORMS, INC., a Delaware
26 corporation,
27 Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF JUDD LAUTER IN
SUPPORT OF DEFENDANT META
PLATFORMS, INC.'S MOTION FOR LEAVE
TO FILE A RESPONSE TO PLAINTIFFS'
OBJECTIONS TO META'S REPLY EVIDENCE**

1 I, Judd Lauter, hereby declare:

2 1. I am a Special Counsel at Cooley LLP and a member in good standing of the state
3 bar of California. I am outside counsel for Defendant Meta Platforms, Inc. (“Meta”) in this
4 litigation. Unless otherwise stated, the contents of this Declaration are based on my personal
5 knowledge of the relevant facts and, if called to testify as a witness, I could and would testify
6 competently thereto.

7 2. Pursuant to Civil Local Rules 7-3 and 7-11, I submit this declaration in support of
8 Defendant Meta Platforms, Inc.’s Motion for Leave to File a Response to Plaintiffs’ Objections to
9 Meta’s Reply Evidence (Dkt. 552).

10 3. On Monday evening, April 28, 2025, I informed Plaintiffs’ counsel that Meta would
11 be filing this motion for leave and asked Plaintiffs to provide Meta with their position on the motion.
12 Counsel for Plaintiffs responded on April 29, 2025 that Plaintiffs do not stipulate to the motion.

13 4. Attached hereto as **Exhibit A** is Meta’s proposed response to Plaintiffs’ Objections
14 to Meta’s Reply Evidence.

15
16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct.

18 Executed in Berkeley, California on this 29th day of April, 2025.

19
20 /s/ Judd Lauter

Judd Lauter